

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification – EB Docket 06-36**

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
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Washington, DC 20554

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date filed: March 1, 2010  
Name of company covered by this certification: Odessa Office Equipment  
Form 499 Filer ID:  
Name of signatory: Marlon Schafer  
Title of signatory: Owner  
Certification:

I, Marlon Schafer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Marlon Schafer

cc: Best Copy and Printing, Inc. (via email FCC@BCPIWEB.COM)

Attachments: Accompanying Statement explaining CPNI procedures

## **CUSTOMER INFORMATION POLICY**

Odessa Office Equipment has established the following company policy regarding customer information:

1. Access to all of the company's proprietary data bases, including those containing customer information is strictly limited and most are password protected. Distribution of the password is limited to authorized personnel. Passwords are changed routinely, and whenever an employee with access to such data bases leaves the company. Online access to CPNI is password protected, and the company employs authentication procedures before allowing access.
2. Call detail information or other CPNI based on a customer-initiated telephone contact is not released without requiring the customer to provide a pre-established password or identifier. Each new customer is required to select a personal password and to provide the company with certain information that only the customer knows, which password and information is to be used by the company for identification purposes prior to disclosing CPNI to a customer.
3. No customer information in any form is to be removed from the company's offices by employees or others, except as described herein. This includes computer printouts, handwritten information or notes, copies of files or documents in any electronic form, and verbal transmission of customer information to persons who are not direct employees of the company. In the case of service work, a work order and customer data sheet are issued only to company personnel, and the work order is signed by the customer. One copy is left with the customer as a receipt, while the other copy is returned to the office. The customer data sheet also is left with the customer.
4. Employees are required to closely guard customer lists, contact information, telephone numbers, and all other customer information, both proprietary and public, to prevent any information from being removed from our offices by non-employees either accidentally or intentionally. At the time of employment, employees receive training and are required to review the company's policies regarding the use of subscriber information. Failure to comply would result in disciplinary process by the company.
5. Neither the company nor third parties or affiliates use customer CPNI in sales and marketing campaigns; however, if outbound marketing campaigns commence, the company will establish a supervisory review process and will retain records of customers' CPNI preferences.
6. Internal documents and anything containing customer names and telephone numbers are shredded routinely. Inactive customer files are retained for 10 years and will be destroyed after the retention period has elapsed.

7. Customer information is never to be used or disclosed to anyone without the customer's knowing consent, except as follows:
  - a. to protect the company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;
  - b. to comply with the company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
  - c. to resolve specific customer questions about the customer's account, arising in the course of a telephone conversation between that customer and the company's service representative.
8. Appropriate disciplinary action will be taken for any violations of this policy.